

**IN THE UNITED STATES FEDERAL COURT
OF THE NORTHERN DISTRICT OF ILLINOIS**

JESSICA NAYVELT and)	
ERICA NAYVELT,)	
)	CASE NO.: 2014-cv-06952
Plaintiffs,)	
)	
vs.)	
)	
FRONTIER AIRLINES,)	
)	
Defendant.)	

**AGREED MOTION TO EXTEND TIME FOR DEFENDANT FRONTIER AIRLINES,
INC. TO FILE RESPONSIVE PLEADINGS**

Now Come Plaintiffs, JESSICA NAYVELT and ERICA NAYVELT, and defendant, FRONTIER AIRLINES, INC. (“Frontier”), by and through their undersigned attorneys, and for their agreed motion for extension of time, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, respectfully request this Court to grant Frontier until December 10, 2014, to file its responsive pleadings to Plaintiffs’ complaint. In support thereof, the parties state as follows:

1. Plaintiffs filed their complaint on September 9, 2014.
2. On or about September 18, 2014, counsel for Frontier executed a Waiver of Personal Service of Process. Pursuant to Rule 12(a)(1)(A) of the Federal Rules of Civil Procedure, Frontier is required to file its responsive pleading on November 10, 2014.
3. Pursuant to motion, the Court scheduled a settlement conference for November 24, 2014.
4. Frontier seeks an extension of time up to and including December 10, 2014, to file its responsive pleadings to Plaintiffs’ complaint in light of the upcoming settlement conference. Frontier also seeks an extension to allow Frontier to conduct further investigation in order to adequately respond to Plaintiffs’ complaint and effectively defend against the claims therein.

5. On November 5, 2014, Frontier's counsel communicated with Plaintiffs' counsel regarding Frontier's request for an extension of time. Plaintiffs' counsel agreed to file an agreed motion seeking an extension of time for Frontier to file its responsive pleading.

6. This is Frontier's first request for an extension of time to respond to Plaintiffs' complaint, this motion is not brought for purposes of delay and neither party will be prejudiced if the Court grants the requested extension.

WHEREFORE, Plaintiffs, JESSICA NAYVELT and ERICA NAYVELT, and defendant, FRONTIER AIRLINES, INC., respectfully request this Court to enter an order granting defendant, FRONTIER AIRLINES, INC., until December 10, 2014, to file its responsive pleadings to Plaintiffs' complaint.

Dated: November 7, 2014

Respectfully submitted,

/s/ Brian T. Maye
Brian T. Maye
Adler Murphy & McQuillen LLP
20 S. Clark Street, Suite 2500
Chicago, Illinois 60603
Telephone: (312) 422-5713
bmaye@amm-law.com

Attorneys for Defendant Frontier Airlines, Inc.

/s/ Vladimir M. Gorokhovsky with consent
Vladimir M. Gorokhovsky
Gorokhovsky Law Office, LLC
6045 North Green Bay Avenue, Suite 2A
Glendale, WI 53209
Telephone: (414)-581-1582
gorlawoffice@yahoo.com

Attorney for Plaintiffs

CERTIFICATE OF SERVICE

The undersigned attorney certifies that on November 7, 2014, he served the foregoing document by electronically filing the same with the Clerk of the U.S. Federal Court for the Northern District of Illinois, by using the CM/ECF system, which will send notification of such filing to all CM/ECF participants.

/s/ Brian T. Maye